a. LENS Does Not Offer Parity of Access.

25. LENS has significant deficiencies that preclude nondiscriminatory access to BellSouth's OSS. The major drawbacks are: (1) LENS requires substantial human intervention and manual re-entry (re-typing or cut-and-paste) of data by CLECs, and BellSouth has not provided the specifications and other tools necessary to enable CLECs to avoid this burden by integrating their systems with LENS; and (2) LENS does not provide CLECs with the same pre-ordering capabilities that BellSouth's own retail sales representatives have.[19]

1. LENS Cannot Be Integrated With a CLEC's Systems, Thereby Requiring Dual Entry of Data.

26. An "interface" is a point at which independent systems are integrated. Logically, an "electronic interface" is a point at which two independent systems are electronically

[19] A number of state commissions have determined that web-based interfaces such as LENS do not provide nondiscriminatory access to OSS. For example, several state commissions have found that US West's web-based interface does not meet the requirements of Section 251 or its implementing regulations. See Findings of Fact and Conclusions of Law Order issued March 20, 1997, in Docket No. TC96-184 (South Dakota PSC), p. 25 (web-based interface is a "human interface," provides "inferior" service, and "does not comply with the federal Act or the FCC First Report and Order"); Arbitrator's Decision issued March 19, 1997, in Case No. PU-453-96-497 (North Dakota PSC), p. 57 ("the web-based interface does not meet the requirements of the FCC's First Report"); Arbitration Decision and Order (No. 5961b) issued March 20, 1997, in Docket No. D96.11.200 (Montana PSC), p. 56 ("the web page solution is a human interface and is prone to error," and "provides service inferior to that which US West provides itself"). See also Administrative Law Judge's Ruling on the Status of the Record issued July 8, 1997, in Case 97-C-0271 (NYPSC), pp. 24-32 (finding that New York Telephone had not shown that its OSS, which included a web-based interface for pre-ordering, were available at parity to resellers, given the continued need for manual intervention, lack of functional parity, and greatly disparate response times). The United States Department of Justice has also noted the inadequacies of web-based interfaces, stating that the dual data entry that such interfaces usually require puts larger CLECs at a significant competitive disadvantage. See Evaluation of the United States Department of Justice filed May 16, 1997, in CC Docket No. 97-121, App. A, pp. 74-75.

integrated. The BellSouth Interconnection Agreement with AT&T recognizes this fact, defining an "electronic communication interface" as "a machine-to-machine or application-to-application interface," and specifically excluding from this definition "an interface that provides a presentation for manual entry." Interconnection Agreement, Att. 15, § 4.6.

27. Under this definition, BellSouth clearly does not provide an electronic interface, because LENS is currently incapable of being electronically integrated with a CLEC's systems. Instead, LENS requires a new entrant's service representative to operate manually BellSouth's electronic OSS (i.e., human-to-machine) rather than allowing the new entrant's systems to be integrated with BellSouth's electronic OSS (i.e., machine-to-machine).

28. Because LENS is not integrated electronically with the new entrant's systems, a CLEC service representative using LENS must manually input the same data twice -- once into BellSouth's OSS, and then again into the new entrant's systems. If the new entrant does not do so, the data will not be stored in its own systems.

29. Moreover, BellSouth has not provided CLECs with methods that would enable them to avoid the necessity of dual data entry by integrating LENS with their own systems, including the specifications that (as BellSouth's own OSS witness in state proceedings has previously acknowledged) are necessary to achieve such integration.

30. By providing an interface that requires resellers to enter manually the same information twice without providing the means by which CLECs can integrate LENS with their own systems, BellSouth has failed to provide parity of access. In contrast to resellers using LENS, BellSouth representatives enter data only once into BellSouth's integrated system for its

retail operations. This discrepancy puts the CLEC at a distinct competitive disadvantage, both because dual data entry increases the costs of conducting a pre-ordering transaction, and because the necessity of entering data a second time increases the risks of error.

31. None of BellSouth's suggested solutions is practical. For example, although the LENS Users Guide suggests that new entrants can print out the LENS screens to record the pre-ordering information and avoid dual data entry, such a solution is unrealistic and unwieldy. First, service representatives typically do not have printers with their terminals. Secondly, a printer would not be practical because, as a pre-ordering interface, LENS does not "remember" information. Consequently, a new entrant would be required to print out numerous screens rather than one summary screen. Finally, as discussed below, the new entrant would still be required to input the printed pre-ordering information manually into an EDI order for its own systems. In other words, after completing the lengthy process of obtaining the information through LENS, the new entrant would be required to go through another lengthy process of sorting through the computer print-outs to re-input that information manually into an EDI order. Clearly, this duplicative and manual process does not meet the requirements of the 1996 Act.

32. Similarly, Mr. Stacy misses the point when he asserts that a CLEC can avoid the problem of dual data entry through any of three possible methods: (1) utilization of the Common Gateway Interface ("CGI"); (2) "cutting and pasting" information from LENS into another Microsoft Windows-compatible application; and (3) customization of the data supplied through LENS by a CLEC's software developers; Stacy OSS Aff., ¶¶ 43-45. Notably, BellSouth is not required to utilized any of these work-around methods in order to access and store the data

that is needed in pre-ordering. Thus, even if the methods to which Mr. Stacy refers were viable, they would not provide a CLEC with access equivalent to BellSouth. In any event, Mr. Stacy's descriptions of the viability of these methods is as incorrect as they are misplaced.

33. First, BellSouth has made use of CGI impossible. A new entrant cannot implement CGI unless BellSouth provides the technical specifications that, it has admitted in state proceedings, are necessary for the development of CGI.[20] BellSouth has affirmatively refused to do so, as a brief chronology of the relevant events demonstrates.

34. When AT&T learned in 1996 that LENS could not be integrated into its own systems, it had two choices. On the one hand, AT&T could implement a long-term solution, working collaboratively with BellSouth and the rest of the industry to develop an industry standard pre-ordering interface that would be integrated with AT&T's systems. Alternatively, AT&T could seek a short-term solution, in which AT&T would attempt to integrate LENS with its own systems through a method developed with BellSouth.

35. AT&T ultimately decided to pursue both the long-term and short-term solutions to the problem. The long-term solution became feasible by early 1997, when BellSouth agreed to implement by the end of the year an integrated pre-ordering interface based on evolving industry standards. Moreover, in March 1997 it became clear that the industry was moving toward adopting standards for pre-ordering; the OBF had already made substantial progress towards defining the data elements for pre-ordering systems as EDI, and had taken the first steps

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[20] See testimony of Gloria Calhoun in Docket No. 25835 (Ala. PSC), transcript of August 19, 1997 hearing, pp. 686-687 (Attachment 3 hereto).

toward adoption of EDI as an interim protocol.[21]

36. Because the implementation of the permanent pre-ordering interface was not scheduled until December 1997, AT&T decided also to pursue a short-term solution that would allow it to enter the market before that time using a method that integrated LENS with AT&T's own systems. Thus, from the time AT&T and BellSouth first met to discuss LENS in August 1996, AT&T emphasized its need for a machine-to-machine interface, including a method that would integrate LENS with AT&T's systems. On September 6, 1996, in response to AT&T's request, BellSouth prepared a "White Paper" describing the CGI interface as a method that, BellSouth claimed, could generate tag values from its LENS server in lieu of web pages. If the CGI interface could be properly implemented by AT&T, AT&T could use it to integrate LENS messages into its ordering systems by converting the LENS message into formats that AT&T's systems would recognize and be able to manipulate. This would allow direct two-way exchange of information between AT&T's ordering systems and BellSouth's legacy pre-ordering and ordering systems.[22]

37. However, AT&T could not build the CGI interface unless and until

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[21] In March 1997, a Steering Subcommittee of the Electronic Communications Implementation Committee ("ECIC") of the Telecommunications Industry Forum recommended EDI as an interim protocol to transport EDI-formatted pre-ordering between carriers. See Stacy OSS Aff., ¶ 6. A copy of the task force's recommendation is attached to my testimony as Attachment 4. In its Ameritech decision, the Commission noted that industry standard-setting bodies expect to arrive at initial agreement on pre-ordering standards by the end of 1997. Ameritech Michigan Order, ¶ 218.

[22] Charts depicting the role of the CGI interface are attached hereto as Attachment 5.

BellSouth provided the necessary detailed specifications describing the data elements and instructions that would be exchanged over it. The September 1996 White Paper did not provide AT&T with those specifications; rather, it was only a general outline of CGI. See Attachment 1g hereto. During the four months following the issuance of the White Paper, AT&T repeatedly requested -- without success -- the specifications necessary to implement this method. When BellSouth and AT&T finally met on January 23, 1997, BellSouth stated that it would dedicate its resources to implementing LENS by March 31, 1997, but that it could implement the tag values necessary for CGI implementation by May 1, 1997. AT&T responded by renewing its request for CGI specifications.

38. BellSouth did not provide CGI specifications to AT&T until March 20, 1997 -- and only after AT&T escalated the issue to the executive level. Even those specifications were incomplete.[23] On April 8, 1997, less than three weeks after it provided the partial specifications, BellSouth retracted them and advised AT&T that the tag value method described in the March 20 specifications and the "white paper" was not feasible. In conference calls on April 14-15, 1997, BellSouth stated that it had abandoned its efforts to develop the alternatives presented in its September 1996 White Paper and stated that it would not support development of the CGI interface under any circumstances. On April 15, BellSouth effectively confirmed this position when it advised the Georgia PSC that "because the CGI alternative builds upon the LENS interface, firm specifications for the CGI interface cannot be provided until the LENS

[23] A copy of the March 20, 1997 specifications is attached hereto as Attachment 6.

interface is finalized"[24] -- which, BellSouth has predicted, will not occur before early 1998.[25]

39. On April 28, 1997, BellSouth provided AT&T with a set of "specifications" of LENS web page outputs that were supposedly current as of that date.[26] Those "specifications", however, involve only hypertext markup language ("HTML"), which is a description of the pages that come out. They do not contain the specifications regarding the operations of LENS behind the page -- specifications that a CLEC must have in order to connect the CGI interface with BellSouth's legacy systems.[27] They therefore were insufficient to enable a CLEC to build the CGI

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[24] See BellSouth's Report to the Georgia Public Service Commission, "Electronic Interface for the New Local Markets," submitted April 15, 1997, p. 9 (emphasis added) (Attachment 7 hereto).

[25] See letter from Cassandra Daniels (BellSouth) to Cindy Clark (AT&T), dated May 19, 1997 (Attachment 8 hereto). On August 11, BellSouth again stated that "changes will occur in the ordering functions [of LENS] over the next six to nine months." BellSouth's August 11, 1997 response, in La. PSC Docket No. U-22252, p. 60 (response to Item No. AT&T p. 1, q. 2) (Attachment 9 hereto). Although BellSouth has asserted that its statements pertain only to LENS' ordering capability (the LENS Firm Order Mode), as opposed to its pre-ordering capability, BellSouth is relying on the Firm Order Mode of LENS in support of its position that LENS provides parity of access in pre-ordering. Stacy OSS Aff., ¶ 11.

[26] A copy of the April 28, 1997 "specifications" is attached hereto as Attachment 10.

[27] As AT&T pointed out to BellSouth in May 1997, the abandonment of CGI development by BellSouth unreasonably increased the amount of development work that AT&T would have been required to undertake to integrate its systems with LENS. See letter from A.J. Calabrese (AT&T) to Mark Feidler (BellSouth), dated May 5, 1997 (Attachment 11 hereto). Had BellSouth proceeded with CGI development, BellSouth would have provided the specifications and allowed the CGI software in LENS to transmit data to AT&T, rather than to the web page generator of LENS; AT&T would have then undertaken to convert the CGI specifications to the data elements that AT&T needed. With BellSouth's abandonment of the CGI interface development, however, HTML remained the only data stream available to AT&T. To integrate its system with LENS under those circumstances, AT&T would have been required to develop software to parse the HTML code, and then develop additional software to convert the data parsed from the HTML

interface that would provide a CLEC with access to the information in BellSouth's legacy systems.[28]

40. The April 28, 1997 "specifications" were not only too general to serve as specifications, BellSouth quickly let them go out-of-date. As BellSouth's OSS witness has repeatedly acknowledged in recent state § 271 proceedings, BellSouth "discontinued" work on CGI specifications in April and it "ha[s]n't made an effort to keep it updated."[29] In fact, only a few weeks after it provided the April 1997 set of descriptions, BellSouth advised AT&T that the LENS design was not mature, would require "multiple" and "frequent" changes, and would not be stable for six to nine months.[30] Mr. Stacy himself has previously acknowledged that BellSouth

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code into its data formats. This additional effort would have been substantial, in contrast to the relatively small increase in work that would have been required of BellSouth if BellSouth had proceeded with CGI.

[28] Attachment 5 describes the respective roles of HTML and CGI in the context of LENS. An example of HTML appears in the notepad in Exhibit WNS-22 of Mr. Stacy's OSS affidavit.

[29] See Attachment 12, testimony of Gloria Calhoun in Case No. 96-608 (Ky. PSC), transcript of August 26, 1997 hearing, pp. 73-74; testimony of Gloria Calhoun in Docket No. 25835 (Ala. PSC), transcript of August 19, 1997 hearing, pp. 686-687, 689 (BellSouth "discontinued" work on CGI specifications, and there are no completed CGI specifications today); testimony of Gloria Calhoun in Docket No. 960786-TL (Fla. PSC), transcript of September 4, 1997, hearing, p. 1336 (BellSouth "abandoned" effort to develop technical specifications for the CGI interface); testimony of Gloria Calhoun in Docket No. P-55, Sub 1022 (N.C. Utilities Commission), transcript of September 26, 1997 hearing, pp. 9-10 (BellSouth "discontinued" work on CGI specifications; specifications are not up-to-date).

[30] See letter from Cassandra Daniels (BellSouth) to Cindy Clark (AT&T), dated May 19, 1997 (Attachment 8 hereto).

normally makes changes to LENS every week.[31] Nevertheless, despite these changes, BellSouth has not updated the descriptions since they were issued last April.

41. Given BellSouth's failure to update the CGI specifications, and the instability of LENS, Mr. Stacy's assertion that "[w]ith BellSouth's CGI specifications, a CLEC could obtain and manipulate data from a LENS server" is simply not true. Stacy OSS Aff., ¶ 44. A CLEC cannot build the CGI interface without proper, current specifications -- and it certainly cannot build the interface when the system to which it would be built (LENS) is not even stable.

42. Even after BellSouth's April 1997 decision to abandon work on the CGI specifications, AT&T continued both to protest BellSouth's decision not to develop CGI, and to request the necessary specifications.[32] However, BellSouth declined to provide them. By late spring 1997, with no change in BellSouth's position, with changes constantly being made in LENS, and with no available up-to-date documentation, it became clear to AT&T that development of CGI was no longer practicable. Even had BellSouth supplied sufficient specifications by that time, development of the interface would have taken two to three months.[33]

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[31] Deposition of William N. Stacy taken August 14, 1997, in Docket No. 960786-TL (Fla. PSC), pp. 128-129 (Attachment 13 hereto) ("We make changes to the LENS system regularly, normally, weekly").

[32] For example, on May 14, 1997, AT&T complained to the Georgia PSC that BellSouth had reneged on its commitment to develop CGI. See AT&T's Response to BellSouth's April 15, 1997 Monthly Surveillance Report for Electronic Interfaces, filed in Docket No. 6352-U (Ga. PSC), pp. 8-10 (Attachment 14 hereto).

[33] As AT&T showed in its response to the application filed by Ameritech for Section 271 authority, the process for developing an interface takes several months even after the parties have committed themselves to developing that interface. See Affidavit of Timothy M. Connolly filed

With less than six months remaining after completion of such development before the implementation of the long-term solution, development of CGI at that point would have been counterproductive. Thus, AT&T decided to focus its efforts on development of the permanent, long-term pre-ordering interface.[34]

43. Although in state § 271 proceedings BellSouth has asserted that AT&T ceased to express an interest in CGI, precisely the opposite is true. AT&T initially supported the development of both CGI and the permanent pre-ordering interface. However, development of the former proved impossible when BellSouth failed to provide the necessary specifications and achieve the necessary stability in LENS.

44. Because BellSouth does not expect that the LENS design will be stable until sometime in late 1997 or early 1998, it would be commercially impracticable for new entrants to develop a CGI interface in order to integrate their OSS with LENS even if BellSouth provided an accurate set of CGI specifications today. Development of CGI would require a reseller to incur substantial costs, including personnel training costs, in modifying its own OSS to accept and process the unique non-standard data elements used by the BellSouth LENS. Such development at this stage would be particularly unwarranted for AT&T, because the permanent interfaces required by the Interconnection Agreement, including a truly electronic pre-ordering interface, are scheduled to be implemented -- that is, fully tested and in commercial production -- by December

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June 10,1997, on behalf of AT&T in CC Docket No. 97-137, ¶¶ 205-206.

[34] See letter from A.J. Calabrese (AT&T) to Quinton Sanders (BellSouth), dated July 28, 1997 (Attachment 15 hereto).

31, 1997. See Stacy OSS Aff., ¶ 42. It would be illogical for AT&T or any other new entrant to expend two to three months of time and resources to develop an interface that likely could not be implemented until either concurrently with, or even after, the implementation of the permanent interfaces.

45. For these reasons, the CGI interface cannot be developed, and BellSouth's failure to deliver the necessary information was the reason why AT&T never built a CGI interface.

46. Second, Mr. Stacy's proposed cut-and-paste method is a time-consuming, manual process that requires the use of multiple fields and multiple steps and would be an option only for those CLECs that have specific types of software compatible with that method. Id., ¶ 44. From a practical standpoint it offers few, if any, advantages over retyping the information into the new entrant's OSS. Because the data elements and formats used in LENS are not consistent with those used in the industry standard EDI ordering interface, the PC-based EDI package, or the Ordering and Billing Forum ("OBF") fax forms, cutting and pasting will additionally require manual editing in the creation of orders. Indeed, this would be true of any cut-and-paste type software alternative.[35]

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[35] See Stacy OSS Aff., ¶ 6 (acknowledging that "there is no industry standard for the pre-ordering function"). Although Mr. Stacy attempts to justify BellSouth's failure to provide a machine-to-machine pre-ordering interface by asserting that "electronic bonding or a machine-to-machine interface would not satisfy the needs of every CLEC," the reverse is also true. See id., ¶ 45. A human-to-machine interface such as LENS will not satisfy BellSouth's OSS obligations if, as is the case here, that interface cannot meet the needs of large-volume CLECs. The Commission has recognized that it may be necessary for a BOC to offer more than one mode of access to satisfy its obligations. See Ameritech Michigan Order, ¶ 137 & n.333.

47. Finally, the data customization process cited by Mr. Stacy also is not a viable option. As BellSouth's OSS witness in the state Section 271 proceedings has previously admitted, data customization can be used only if the CLEC knows the specifications of the BellSouth system.[36] However, as previously discussed, BellSouth has not made these specifications available to AT&T.

2. LENS Does Not Provide CLECs With The Same Capabilities That BellSouth Has In Its Own Retail Operations.

48. In addition to the necessity of dual data entry, BellSouth does not provide parity of access to BellSouth's OSS in pre-ordering because LENS denies CLECs certain important capabilities that BellSouth has in its retail operations. For example: (1) LENS does not enable CLECs to reserve firm, calculated due dates for most transactions; (2) LENS uses a multiple-screen process that requires CLECs repeatedly to input and validate a customer's address during the pre-ordering function; (3) CLECs using LENS do not have the same telephone number access and reservation capabilities that BellSouth has in its retail operations; (4) LENS does not enable CLECs to perform the same telephone number searches as BellSouth's own retail representatives; (5) LENS does not present customer service record ("CSR") information in a recognizably fielded format, using industry standard codes, or in BellSouth codes which have been documented for use by CLECs, thereby requiring the CLECs to devote substantial time and

[36] See testimony of Gloria Calhoun in Docket No. 97-101-C, Proceeding To Address BellSouth Entry Into the InterLATA Market (Section 271) (South Carolina PSC), transcript of July 7, 1997, proceedings, p. 272 (Attachment 16 hereto).

resources to re-format and re-enter the data in order to utilize it; and (6) CLECs are given no advance notification of changes in LENS, thus denying them the opportunity to avoid the possible disruptions in their operations that such changes will cause. None of these problems is encountered by BellSouth's service representatives.

49. **Ability To Obtain Firm, Calculated Due Dates.** The ability to provide a customer with prompt service at parity with BellSouth's is critical to customer satisfaction and to a new entrant's ability to compete. Customers expect a carrier not only to provide service promptly, but also to be able to tell them, while they are still on the line, the date when the service is scheduled to be installed (the due date).

50. BellSouth's service representatives can ascertain the earliest available due date by using BellSouth's Direct Order Entry Support Applications Program ("DSAP"), which uses an intricate set of logic that applies an algorithm to a number of variable inputs (including the number of lines, type of service, work load, and availability of network facilities) in order to calculate the due date. If the earliest available due date does not meet the customer's needs, the BellSouth service representative can use DSAP to ascertain alternative available dates that are convenient for the customer. Once the customer accepts a proposed due date, the BellSouth service representative can reserve that due date and schedule an appointment using BellSouth's Service Order Completion System ("SOCS").

51. The essential functionality of DSAP that would allow a CLEC to obtain a calculated due date is available only when a new entrant operates LENS in its Firm Order Mode -- that is, when a new entrant is using LENS for both pre-ordering and ordering. That functionality

is not available when a CLEC uses EDI as its ordering interface. Those CLECs, such as AT&T, that require EDI for ordering thus do not have parity of access to DSAP when using LENS only for pre-ordering. Instead of having access to DSAP's intricate set of logic, users of the EDI ordering interface are provided only with tables showing the days of the week the applicable central office and work center are open, projected service intervals (a standard interval guide) for the applicable work center, and days on which no additional work will be accepted, from which they can "estimate" a due date.[37] The "estimated" due date, however, is not firm; the actual scheduled due date will be assigned by BellSouth, after the service order has entered BellSouth's systems. The new entrant and its customer will learn of the actual due date only when BellSouth transmits the Firm Order Confirmation ("FOC") notice -- which BellSouth has committed to transmit only within 24 hours of receipt of the order. Because BellSouth has estimated that 80 percent of all CLEC orders will be submitted via EDI (rather than by the LENS ordering functionality), this lack of access to DSAP means that resellers will be unable to obtain calculated due dates for the vast majority of their orders at the time a customer requests service.[38]

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[37] See Stacy OSS Aff., ¶ 32. This "view installation calendar," as it appears on LENS, is set forth in Exhibit WNS-17 of Mr. Stacy's OSS affidavit.

[38] In addition to the numerous deficiencies of LENS that exist in the pre-ordering context for resellers, LENS places purchasers of UNEs at an even greater competitive disadvantage than resellers with respect to requesting due dates. Although no CLEC using LENS for pre-ordering and EDI for ordering can obtain a calculated due date before receiving the FOC, resellers at least have access in LENS to a standard interval guide that assists them in estimating a due date while on the line with their customer. By contrast, LENS provides no due date intervals for UNEs. As Mr. Stacy acknowledges, UNE purchasers are relegated to using paper standard intervals (and the installation calendar for resellers in LENS) to estimate a due date and appointment. Stacy OSS Aff., ¶ 37. Any date estimated on this ad hoc basis will necessarily be unreliable. Because

52. Thus, Mr. Stacy's assertion that a CLEC "can obtain due date information from DSAP through LENS" is highly misleading. Id., ¶ 34. The "calendar information" that a CLEC can obtain in the LENS Inquiry Mode may be "helpful" (to use Mr. Stacy's term), but it is not the same as a calculated due date. Id., ¶ 32. Mr. Stacy does not, and cannot, deny that BellSouth sales representatives always can obtain a firm, calculated due date in its retail operations.

53. LENS denies parity of access with respect to due dates in other respects. Unlike the systems used by BellSouth's sales representatives, LENS does not display indicators that can be used to determine whether a technician actually needs to be dispatched.[39] Instead, the interval guide automatically assumes that the order requires a premises visit even if (as in the case of many simple migrations) it does not. Thus, CLEC customers will incur unnecessary delay and the longest possible due dates.

54. In short, CLECs using EDI as their ordering interface will not be able to tell their customers with certainty, while they are on the line, the date when their service will be installed or repaired, nor respond to their customers' special scheduling needs. BellSouth's own service representatives face no such limits.

55. The new entrant's inability to access the essential functionality of DSAP

BellSouth's representatives can reserve due dates electronically, while CLEC representatives cannot even electronically estimate a due date, BellSouth's practice is clearly discriminatory.

[39] Mr. Stacy does not deny this disparity -- which is clearly discriminatory -- but simply promises that BellSouth will correct it. Stacy OSS Aff., ¶ 47.

when using LENS for pre-ordering will have a significant effect on competition. First, because a CLEC is unable to tell a prospective customer while on the line with the service representative the precise date when the service will be completed, the customer is likely to question the competence and service-orientation of that CLEC -- and will be less willing to take a chance on that CLEC. Second, CLECs are unable to promise to install service as quickly as BellSouth can. Third, the new entrant's customers will be more likely to experience a rescheduling of due dates than a similarly situated BellSouth customer, because -- unlike BellSouth's representatives -- the new entrant does not know until hours (or even days) after submitting an order whether the due date that it described to the customer based on a scheduling "interval" is actually available. If that due date is not available, the new entrant must contact the customer and go through the scheduling process again (with the possibility of the need for several schedule selection attempts, when the date or appointment selected by BellSouth's SOCS does not meet the customer's requirements).

56. **The Multiple-Screen, Repetitious Nature Of The LENS Process.** Users of LENS are required to go through multiple screens (approximately 20 in total) just to complete the pre-ordering process. The repetitive nature of this procedure is further exacerbated by the fact that the LENS Inquiry Mode (the pre-ordering mode) is not internally integrated. In other words, information inputted or obtained during the performance of one pre-ordering function is not automatically carried forward into a subsequent pre-ordering function. Thus, in its pre-ordering mode LENS requires a new entrant to input and validate the address at the beginning of every pre-ordering transaction except when viewing customer service records, because each pre-ordering transaction has been designed by BellSouth as an independent operation in LENS. As a

result, in order to obtain all of the information necessary to prepare an order for input via EDI interface, a new entrant must validate a customer address as many as four times during the pre-ordering process. These repetitious, unnecessary procedures cause delay, increase costs, and invite errors. BellSouth representatives, by contrast, can perform these functions without such repetition, because BellSouth's own internal OSS is fully integrated.

57. Mr. Stacy's attempts to defend the necessity of repeating address verification on LENS is without merit. See Stacy OSS Aff., ¶ 19. The fact that "address validation is a necessary input for other pre-ordering functions," and that "associating a central office with an address is a prerequisite for each of [the pre-ordering] functions," begs the question. Id. There is no reason why BellSouth cannot integrate LENS internally so that LENS will remember an address the first time it is entered -- as BellSouth's Regional Negotiation System ("RNS") and Direct Order Entry ("DOE") system are designed to do. Finally, Mr. Stacy's attempt to portray the need for multiple address validations as a "benefit" is illogical and unpersuasive, since BellSouth has not chosen to provide this benefit to itself. Id. BellSouth's DOE and RNS systems both allow BellSouth representatives to choose which pre-order functions they desire, without having to validate the address with each function used.[40]

58. **Telephone Number Access And Reservation.** Mr. Stacy contends that CLECs "can select and reserve a telephone number (or directory number) via the LENS pre-

[40] Although Mr. Stacy asserts that CLECs "benefit" because RNS has no inquiry mode, he fails to mention that DOE does have an inquiry mode and that RNS requires no inquiry mode because of its integrated operation. See Stacy OSS Aff., ¶ 19.

ordering interface," and that "LENS does not limit the number of telephone numbers that are available for new entrants." Stacy OSS Aff., ¶¶ 23, 25. That is simply not the case. In reality, by imposing limitations on the telephone numbers available to CLECs, BellSouth does not provide CLECs using LENS with access to telephone numbers that is equivalent to BellSouth's. As a pre-ordering interface, LENS limits new entrants to a maximum of 100 reserved telephone numbers, or a volume of reserved numbers equal to five percent of the available numbers in the central office associated with the customer's address, whichever is lower.[41] This limitation is discriminatory, because BellSouth imposes no such telephone number limitation on itself. As a practical matter, the 100-number limit will adversely affect only large new entrants such as AT&T, because the larger new entrants are more likely to submit orders in quantities that could exceed the 100-number limit.[42]

59. Regardless of the size of the CLEC, BellSouth's alternative five percent limitation on phone numbers will work a hardship on any CLEC seeking to serve suburbs of large

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[41] Reserved numbers are numbers set aside for the CLEC's exclusive use for future assignment to its customers. As will be discussed below, the Interconnection Agreement between AT&T and BellSouth only requires BellSouth to reserve up to 100 telephone numbers per NPA-NXX for AT&T's sole use. However, the Agreement does not authorize the alternative five percent limitation imposed by BellSouth. Interconnection Agreement, § 28.1.1.4.

[42] Attachment 17 is a chart that contrasts the various restrictions on telephone numbers imposed by BellSouth on RNS, DOE, the interim manual/electronic interfaces required by the Interconnection Agreement, the LENS Firm Order Mode, and the LENS Inquiry Mode. Although the 100-number/5 percent limitation does not apply to the ordering functionality of LENS (the Firm Order Mode), as a practical matter a new entrant using EDI as its ordering interface cannot receive a number by using the LENS Firm Order Mode because the number is released as soon as the new entrant aborts the particular LENS order.

metropolitan areas, where available numbers may be scarce due to a high rate of population growth. To the extent that a CLEC has success in such communities, it will constantly be denied the ability to reserve numbers electronically, be forced to obtain numbers from BellSouth using a laborious, discriminatory, case-by-case manual process, and be unable to serve its customers in a timely manner.

60. Mr. Stacy's characterization of the 100-number/5 percent limitation as a telephone conservation measure, and not a limitation on telephone numbers, is absurd. Stacy OSS Aff., ¶ 25. If BellSouth truly wished to "administer the finite pool of numbers for the benefit of all," it would limit its own ability to obtain reserved numbers, since it is by far the largest user. It has not done so. Mr. Stacy is equally wrong in asserting that the limitation "does not limit a CLEC's ordering activity." Id. The very purpose of reserving telephone numbers is to use them in ordering. Id.

61. Mr. Stacy also defends the number limitation by asserting that the supply of reserved numbers "can be replenished daily." Id. BellSouth, however, has already denied a significant number of AT&T's requests for additional reserved telephone numbers. In many instances, BellSouth has denied requests for as few as 10 numbers, on the ground that AT&T's limit has been reached.[43] All too frequently, AT&T has run out of telephone numbers in certain central offices. For some offices, the number of telephone numbers assigned to AT&T is considerably less than 100 numbers.

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[43] See letter from Pamela Nelson (AT&T) to Jan Burriss (BellSouth), dated September 3, 1997 (Attachment 18).

62. The limitations on telephone numbers imposed by BellSouth substantially limit a CLEC's ability to compete. Customers expect that they will be assigned a telephone number, on which they can rely, at the time they call to request service. If a CLEC is delayed in supplying the number because LENS advises that no numbers are available, the representative must call BellSouth for more numbers and the customer is likely to question the competence of the CLEC. Moreover, the limitation makes it difficult for CLECs efficiently to handle orders from businesses, many of which require a large volume of telephone numbers at one time. BellSouth itself, being free of the restrictions on telephone numbers that it imposes on CLECs, faces no such risks. This is plainly discriminatory.

63. In citing the ability of CLECs to request additional numbers, Mr. Stacy also ignores commercial realities. BellSouth's systems do not provide a CLEC with the ability to know the precise amount of reserved numbers that it has selected, or that it has remaining at a particular time. Thus, a CLEC must attempt to manually maintain an "inventory" of the number of reserved telephone numbers still available by recording each reserved number as it is obtained and as it is assigned to a customer. This manual inventory must be maintained for each of the 200 BellSouth central offices in South Carolina. In AT&T's case, even a manual inventory would be virtually impossible to maintain, because the number limitation is most often reached by AT&T in situations where the 5 percent limitation applies, and AT&T has no means of knowing the number of telephone numbers actually available at a given time from a particular central office. BellSouth's OSS, by contrast, automatically maintain an inventory of telephone numbers for use by its retail operations.

64. Moreover, there are no procedures for obtaining numbers from BellSouth to be used to fill orders from CLECs when the 100-number/5 percent limitation on reserved numbers has been exceeded. All of BellSouth's proposed electronic solutions for obtaining additional reserved numbers (such as the Network Data Mover, and LENS itself) are subject to the same limitation.[44] BellSouth's Local Carrier Service Center has no procedures for providing numbers to CLECs whose reserved numbers exceed the limitation. Thus, any additional numbers must be ordered by either telephone or facsimile.

65. The number limitations imposed by BellSouth, together with the procedures that a CLEC must follow to obtain additional numbers, are a substantial burden on carriers which, like AT&T, will submit hundreds or even thousands of orders per day from a particular area. In its Ameritech Michigan Order, this Commission stated that it "would question whether a BOC's local telecommunications market is open to competition absent evidence that the BOC is fully cooperating with new entrants to efficiently switch over customers as soon as the new entrants win them." Ameritech Michigan Order, ¶ 21. BellSouth's limitation on the number of reserved numbers clearly does not evidence such cooperation.

66. The unequal treatment that the 100-number/5 percent limitation imposes on entrants who use LENS for pre-ordering, and EDI for ordering, is exacerbated by two BellSouth policy decisions. First, as shown in Attachment 17, any number that a CLEC even views in LENS

[44] The "interim interface" provisions of the Interconnection Agreement provide for number assignment via the Network Data Mover ("NDM") using Connect:direct. Interconnection Agreement, Att. 15, § 4.5. However, now that AT&T is using LENS, it will use LENS for number assignment.

is counted against its "reserved" total for 24 hours, regardless of whether the CLEC actually chooses that number. Thus, if a CLEC views 10 numbers at a time on LENS, all 10 numbers are counted against the "reserved" total for 24 hours.

67. Second, any telephone number selected by such an entrant is only deemed "reserved," and will therefore count against the number of that carrier's reserved numbers, unless and until the number is deemed "selected." However, a telephone number is not transformed from "reserved" status to "selected" status until the service order with that telephone number is entered into SOCS. It could take hours, or far longer, for a service order to be entered into SOCS, since LENS and EDI cannot be interconnected electronically. In contrast, BellSouth deems a telephone number to be "selected," rather than simply "reserved," when BellSouth itself chooses a telephone number for its own customers or a new entrant chooses a telephone number and then uses LENS as its ordering interface. As a result, users of EDI as an ordering interface will be confronted with a loss of the ability to reserve telephone numbers that is not experienced by BellSouth (or by CLECs using LENS for ordering).

68. I verified LENS' discriminatory treatment as to number reservations when I evaluated LENS in June 1997. When I attempted to choose a telephone number in a particular central office via the LENS pre-ordering mode (the LENS Inquiry Mode), I was blocked by the 100-number/5 percent limitation. However, when I made the same attempt in the LENS ordering mode (the Firm Order Mode), LENS presented a list of available numbers. In other words, telephone numbers that are available for reservation to BellSouth and new entrants using LENS in the Firm Order Mode are not available to new entrants that use the industry standard, EDI

ordering interface.

69. A new entrant using LENS is also unable to reserve as many types of telephone numbers as BellSouth. For example, although BellSouth can select up to 25 contiguous numbers using its OSS, a new entrant using LENS cannot select more than six contiguous telephone numbers at a time. BellSouth also can use its OSS to reserve multi-line hunt group numbers, but new entrants cannot use LENS to reserve these numbers.

70. **Telephone Number Search Capabilities.** When a customer desires a special, customized number, a CLEC must have the capability to determine, through a computer search, whether that number exists and, if so, whether that number is available. BellSouth has claimed that LENS can perform nine kinds of telephone number searches: Random Numbers; Vanity Numbers; Easy Numbers; Ascending Line Digits (i.e., 1234, etc.); Descending Line Digits (i.e., 9876, etc.); Identical Line Digits (i.e., 2222, etc.); Sequential Line Numbers (i.e., XXX1, XXX2, XXX3); Special Number Patterns; and Number Exclusions. However, my personal testing of LENS revealed that this was not the case.[45] Even today, LENS cannot perform a number exclusion search. Moreover, LENS cannot perform a search for Special Number Patterns unless the new entrant knows the NXXs available in the relevant central office -- information that LENS does not provide but that is available to BellSouth's customer sales representatives. LENS

[45] For example, until recent months LENS was unable to perform four of those types of searches (Ascending Line Digits, Descending Line Digits, Identical Line Digits, and Sequential Line Numbers).

also does not allow new entrants to select the options of RingMaster,[46] Hunting and Specific NXX. BellSouth's service representatives, by contrast, have the capability to perform all these functions.

71. **Customer Service Record ("CSR") Data.** Although the Interconnection Agreement explicitly entitles AT&T to have access to CSRs, BellSouth did not provide such access until June 1997.[47] Even with such access, the data in the CSR, as it currently appears via LENS, is unnecessarily difficult to use. The data pieces are strung together as a block of data without identifying separation or explanation, and some of the information in the CSR appears as USOC codes. In order for CLECs to be able to use this data in their operations -- as they must -- the data must be reformatted, and knowledge of the USOC codes used in LENS is required.

72. Because of these problems, AT&T requested BellSouth to enter the data on the CSR in the format specified by the Ordering and Billing Forum ("OBF") as the industry standard for the blocking of data. AT&T also requested a guide to the USOCs used by BellSouth in LENS. BellSouth, however, refused the request, stating that the CSR data is stored in the same way on its own OSSs. Instead, BellSouth stated that AT&T could contact BellSouth whenever a problem arose.

73. Even if CSR data is stored in the same way on BellSouth's own systems, the

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[46] RingMaster is a service that allows residential customers using one loop to have more than one phone number, with each number having a distinctive ring.

[47] See Interconnection Agreement, Att. 15, § 7.1.1 (providing that AT&T may gain access to CSRs by issuing a blanket letter of authorization to BellSouth).

refusal of BellSouth to honor AT&T's requests denies AT&T parity of access. When a BellSouth representative has a customer on the line, the information in the CSR that is necessary to complete the order is automatically populated to that order. CLECs do not have that same capability, since they do not have the BellSouth specifications that are needed to decode the data.

74. **No Notice Of Changes In the System.** LENS is a proprietary system, the design of which is owned and controlled by BellSouth. Because such a proprietary system is not required to conform to any industry standards or guidelines, BellSouth can -- and regularly does -- make changes in its system unilaterally, without prior notice to LENS users.

75. When BellSouth makes a change in its own legacy systems, its retail operations are not disrupted, because its customer service representatives are notified and trained in advance of the changes, if necessary. By contrast, CLEC representatives are not advised of changes to LENS in advance of their implementation. In fact, BellSouth does not have reliable procedures in place for notifying CLECs of such changes promptly even after their implementation. Although such changes are incorporated into the LENS Users Guide, CLECs do not receive the new version of the guide until weeks after the change has occurred. For example, the most current version of the BellSouth LENS Users' Guide has a publication date of June 17, 1997 (see Stacy OSS Aff., Exh. WNS-47, p. 1), and therefore does not include changes made since that time. Furthermore, the "release notes" on LENS, which purportedly advise CLECs of new developments regarding LENS, contain no information about changes in LENS other than